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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

WESTERN WATERSHEDS PROJECT
al.,

Plaintiffs,

vs.

RANDY MOORE, in his official capacity
as Chief of the U.S. Forest Service, et al.,

Federal-Defendants.

Case No. 9:22-cv-00149-DLC-
KLD

**DECLARATION OF
MICHELE DIETERICH**

Pursuant to 28 USC § 1746, I, Michele May Dieterich, declare the following:

1. I am over 18 years of age and competent to provide this declaration. I have been a member of Friends of the Bitterroot (FOB), a plaintiff in this case, for ten years. I have been a member of the steering committee for FOB for seven years. I support FOB because they work to protect wildlife, wildlands, and watersheds.

2. I currently reside in Hamilton, Montana and have been a resident of Montana for over 30 years. I lived in Bozeman, near the East Paradise project area, for twelve years. I am a retired art teacher and hiking guide with a Bachelor of Science in film, a Bachelor of Fine Arts, and a Masters in Curriculum and Instruction. I served on Governor Bullock's Grizzly Bear Advisory Council and I currently volunteer as the Education Coordinator for the Bitterroot Bear Resource Committee promoting bear-smart communities to reduce bear/human conflicts and secure attractants in the Bitterroot Valley.

3. I am an avid hiker and I enjoy identifying flowers and seeing wildlife of all types. It gives me great pleasure to know that many of the same wildlife that existed when Lewis and Clark explored the area are still present today. Even if I do not see wildlife, it is comforting to know they still exist on our public lands. I have hiked in the East Paradise project area many times from 1995 to 2005. I have hiked up Black Mountain, Elephant Head, Emigrant Peak, and Mt. Cowan. The weather

forced me to abandon an attempt at the Pyramid, and I hope to return someday in the near future to reach the top. I have also hiked through, or driven by, most of the allotments that are part of the East Paradise project, including many trips up Suce Creek, Pine Creek, and Mill Creek. On these expeditions, I have seen pica, moose, grouse, deer, elk, and black bears. I have enjoyed the remarkable scenery and the rugged peaks that are challenging, but accessible, without climbing gear. It is exhilarating to stand on a peak in the area and take in the spectacular views. I enjoy seeing and trying to identify the many wildflowers found outside of active grazing allotments. I have also camped in the Paradise Valley region multiple times.

However, when I camp, I avoid camping near grazing allotments because they are unsightly, filled with trampled and bare ground, trodden streambeds, and cow dung.

4. I enjoy the memories and photographs of my time spent in the area. I still have friends in Bozeman, Livingston, and Pray, Montana and will visit them in the future. In March of 2024, I plan to enjoy wildlife viewing in Yellowstone National Park and plan to camp and hike in Paradise Valley as well. I hope to make this a biennial trip.

5. I worry that cattle allotments on public lands crowd-out wildlife and create a dangerous temptation for grizzly bears and wolves. As I work hard to convince Bitterroot residents to secure their attractants, I question why the Forest

Service would stock vacant allotments, expand allotments, and increase grazing times so close to the Yellowstone grizzly population. Many wolves and grizzlies have been killed by bear specialists for preying on livestock on public lands. Fencing associated with allotments can affect the movement of birds and animals, including grizzly bears, and cattle trampling waterways creates erosion and sediment in streams. These negative impacts from grazing impact my ability to enjoy wildlife viewing, hiking, and camping in the Paradise Valley both currently and in the future. It is horrifying to see stream banks trampled and cow manure in the creeks. It makes it hard to drink the water even after filtration.

6. As a mountain bike and hiking guide, I have travelled around the West and have experienced both areas where grazing was rampant and areas without grazing allotments. The landscape, the wildlife, the streams, and the wildflowers are completely different in areas with and without cattle grazing. The experience of a pristine landscape with clear running streams is ruined when encountering a muddy stream or meadow with cow manure and cattle hoofprints. It ruins the aesthetic experience.

7. I worry that our native wildlife is threatened by many factors like climate change, drought, expanding human populations, and development. It seems inappropriate to add to these challenges by expanding grazing in the Paradise Valley,

which is such a critically important region for wildlife near Yellowstone National Park. I am saddened every time a bear is killed due to conflicts with humans and livestock, especially when these situations could have been avoided. I am concerned that the wildflowers and native grasses I enjoy viewing will further diminish and invasive weeds will increase as a result of the East Paradise project's approval. My experiences in trying to view grizzly bears and enjoy hiking and camping in this area in the future is likely to be negatively impacted by this project.

8. I believe that the Forest Service should not have elected to expand grazing in the East Paradise project area. Instead, after proper review and analysis of the environmental impacts of the East Paradise project upon wildlife and their habitat in this region, they should have closed these allotments permanently.

9. I have a grand-niece who is 4 years old. I want her to enjoy the same experiences in the area as I have. I want her to see grizzly bears and wolves in the wild when she is old enough to hike and camp near Yellowstone. I want her to see pristine streams and abundant wildflowers. I fear that this project will greatly reduce her chances of experiencing these things in the Paradise Valley.

10. If FOB is successful in their legal challenge to the East Paradise project's approval, the harms to my interests in viewing grizzly bears and enjoying the wildlife habitat, recreational opportunities, and aesthetic beauty the Paradise Valley

affords could be lessened. If FOB is successful, the procedural harms that have occurred to me and FOB and its members would be redressed because the Forest Service would be required to properly analyze the impacts of its proposed action on the environment and the public participation purposes of our federal laws, like the National Environmental Policy Act, would be upheld.

Executed on this 29th day of November, 2023 in Hamilton, Montana.

A handwritten signature in black ink, reading "Michele Dieterich". The signature is fluid and cursive, with the first name "Michele" and last name "Dieterich" clearly legible.

MICHELE DIETERICH